

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:)
CIRCUIT CITY STORES, INC., et al.) Case No. 08-35653-KRH
Debtors.) Jointly Administered
) Chapter 11 Proceedings

NOTICE OF MOTION AND NOTICE OF HEARING

Navarre Distribution Services, Inc. ("Navarre"), by its counsel, has filed papers with the Court requesting the Court to enter an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, the on or before December 18, 2008, you must:

File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1.

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

William C. Redden, Clerk
United States Bankruptcy Court
701 E. Broad Street
Room 4000
Richmond, Virginia 23219

R. Timothy Bryan (VSB # 50931)
Alan M. Noskow (VSB # 51094)
Patton Boggs LLP
8484 Westpark Drive, 9th Floor
McLean, Virginia 22102
(703) 744-8000
Counsel for Navarre Distribution Services, Inc.

Mail a copy of your response and supporting memorandum to:

R. Timothy Bryan, Esquire
Alan M. Noskow, Esquire
Patton Boggs LLP
8484 Westpark Dr., 9th Floor
McLean, VA 22102

If you oppose the Motion, you or your attorney also must:

Attend a hearing on the Motion scheduled to be held on December 22, 2008 at 1:00 p.m. at the United States Bankruptcy Court, United States Courthouse, 701 East Broad Street, Room 5000, Richmond, Virginia 23219

If you or your attorney do not take these steps, including the filing and serving of a written response and supporting memorandum within the time period and in the manner set forth above pursuant to Local Bankruptcy Rule 9013-1, the Court may deem any opposition waived, treat the Motion as conceded, decide that you do not oppose the Motion and issue an order granting the relief requested without further notice or hearing.

Dated: December 12, 2008

Respectfully submitted,

/s/ Alan M. Noskow

R. Timothy Bryan (VSB # 50931)

Alan M. Noskow (VSB # 51094)

PATTON BOGGS LLP

8484 Westpark Drive, 9th Floor

McLean, Virginia 22102

Phone: (703) 744-8000

Fax: (703) 744-8001

E-mail: tbryan@pattonboggs.com

E-mail: anoskow@pattonboggs.com

Counsel to Navarre Distribution Services, Inc.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 12th day of December 2008, a copy of the foregoing Notice of Motion and Hearing and the related Motion of Navarre Distribution Services, Inc., for entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 were filed with the Clerk of the Bankruptcy Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in the matter including the persons on the attached Service List by facsimile:

/s/ Alan M. Noskow
Alan M. Noskow

SERVICE LIST

Robert B. Van Arsdale, Esq.
Office of the United States Trustee
701 East Broad St. Suite 4304
Richmond, Virginia 23219
Fax No.: (804) 771-2330
United States Trustee

Dion W. Hayes, Esq.
Douglas M. Foley, Esq.
McGuire Woods LLP
One James Center
901 East Cary Street
Richmond, Virginia 23219
Fax No.: (804) 698-2078
Fax No.: (757) 640-3957
Counsel for the Debtors

Greg M. Galardi, Esq.
Ian S. Fredericks, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
One Rodney Square
P.O. Box 636
Wilmington, DE 19899-0636
Fax No.: (888) 329-3792
Counsel for the Debtors

Timothy G. Pohl, Esq.
Chris L. Dickerson, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive
Suite 2000
Chicago, IL 60606
Fax No.: (312) 407-0411
Counsel for the Debtors

Linda K. Myers, Esq.
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601
Fax No.: (312) 861-2200
Special Counsel for the Debtors

David S. Berman, Esq.
Riemer & Braunstein LLP
Three Center Plaza, 6th Floor
Boston, Massachusetts 02108
Fax No.: (617) 880-3456
Counsel for Bank of America, N.A.

Bruce Matson, Esq.
LeClair Ryan
Riverfront Plaza, East Tower
951 East Byrd Street, 8th Floor
Richmond, VA 23219
Fax No.: (804) 789-7269
Counsel for Bank of America, N.A.

Lynn L. Tavenner, Esq.
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, VA 23219
Fax No.: (804) 783-0178
*Counsel for the Official Committee
of Unsecured Creditors*

Robert J. Feinstein, Esq.
Pachulski Stand Ziehl & Jones LLP
780 Third Avenue, 26th Floor
New York, NY 10017
Fax No.: (212) 561-7777
*Counsel for the Official Committee
Of Unsecured Creditors*